

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA
PHILADELPHIA DIVISION**

In re: Daniel A. Lieberman) CASE NO. 19-14362-jkf
dba Green Tomato Restaurants LLC) Judge Jean K. FitzSimon
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Debtor.)
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**U.S. Bank Trust National Association, not in its individual capacity but solely as
Owner Trustee for VRMTG Asset Trust's NOTICE OF DEBTOR'S REQUEST FOR
FORBEARANCE DUE TO THE COVID-19 PANDEMIC**

Now comes U.S. Bank Trust National Association, not in its individual capacity but solely as Owner Trustee for VRMTG Asset Trust ("Creditor"), by and through undersigned counsel, and hereby submits Notice to the Court of the Debtor's request for mortgage payment forbearance based upon a material financial hardship caused by the COVID-19 pandemic.

The Debtor recently contacted Creditor requesting a forbearance period of 2 months and has elected to not tender mortgage payments to Creditor that would come due on the mortgage starting 05/01/2020 through 06/01/2020. Creditor holds a secured interest in real property commonly known as 54 Overlook Circle, Garnet Valley, PA 19060 as evidenced by claim number 3-1 on the Court's claim register. Creditor, at this time, does not waive any rights to collect the payments that come due during the forbearance period. If the Debtor desires to modify the length of the forbearance period or make arrangements to care for the forbearance period arrears, Creditor asks that the Debtor or Counsel for the Debtor make those requests through undersigned counsel.

Per the request, Debtor will resume Mortgage payments beginning 7/01/2020 and will be required to cure the delinquency created by the forbearance period (hereinafter “forbearance arrears”). Creditor has retained undersigned counsel to seek an agreement with Debtor regarding the cure of the forbearance arrears and submit that agreement to the Court for approval. If Debtor fails to make arrangements to fully cure the forbearance arrears, Creditor reserves its rights to seek relief from the automatic stay upon expiration of the forbearance period.

Date: 06/9/2020

Robertson, Anschutz, Schneid & Crane LLC

Attorney for Secured Creditor

10700 Abbott's Bridge Road

Suite 170

Duluth, GA 30097

Telephone: 470-321-7112

By: /s/ Charles G. Wohlrab

Charles G. Wohlrab, Esq.

Email: cwohlab@rascrane.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on June 9, 2020, I caused to be electronically filed the foregoing with the Clerk of Court by using the CM/ECF system, and a true and correct copy has been served via United States Mail to the following:

**Daniel A. Lieberman
54 Overlook Circle
Garnet Valley, PA 19060**

And via electronic mail to:

**John L. McClain
John L. McClain and Associates
P.O. Box 123
Narberth, PA 19072-0123**

**Scott F. Waterman
Chapter 13 Trustee
2901 St. Lawrence Ave.
Suite 100
Reading, PA 19606**

**United States Trustee
Office of the U.S. Trustee
200 Chestnut Street
Suite 502
Philadelphia, PA 19106**

**Robertson, Anschutz, Schneid & Crane
LLC**

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